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 for Defendant **RONALD J. HOLMES**

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	Case # 2:13-CR-192-LRH-GWF-1
	)	
Plaintiff(s),	)	<b>RONALD HOLMES' UNOPPOSED</b>
vs.	)	<b>MOTION TO CONTINUE SELF-</b>
	)	<b>SURRENDER DATE TO AUGUST 15, 2014</b>
RONALD J. HOLMES,	)	
	)	<b>Judge: Honorable Larry R. Hicks</b>
Defendant(s).	)	

Defendant Ronald Holmes, by and through his counsel, Michael L. Lipman and Barbara H. Murray of Duane Morris LLP, respectfully submits the following Unopposed Motion to Continue Self-Surrender Date to August 15, 2014. In support of this motion, Mr. Holmes represents that:

1. As set forth in the Judgment imposed on March 26, 2014, Mr. Holmes is required to surrender for service of his 37 month sentence before 12 p.m. on Friday, May 30, 2014.
2. As set forth in the attached letter from Chinyere Okeke, M.D., Mr. Holmes has been diagnosed with a severely arthritic left ankle. (Exhibit A.) According to Dr. Okeke, "this condition

1 would continue to deteriorate over the next 3 years without an ankle fusion surgical procedure.... If  
2 Mr. Holmes waited for a period of 3 years this procedure could become more complicated since he  
3 already has type 2 diabetes.” According to Dr. Okeke, the procedure can be scheduled for the week  
4 of June 5, 2014, followed by eight to twelve weeks of recovery and rehabilitation. As a result, Mr.  
5 Holmes requests a continuance of his self-surrender date to August 15, 2014, which is ten weeks  
6 after the proposed surgery.  
7

8 3. According to Assistant U.S. Attorney Daniel Schiess, the government agrees to  
9 remain silent on this request. (Declaration of Barbara Howe Murray, para. 2.)

10 4. Mr. Holmes will file an acknowledgment of the new self-surrender date.

11 For the foregoing reasons, Mr. Holmes requests a continuance of his self-surrender date from  
12 May 30, 2014 to August 15, 2014.  
13

14 **DECLARATION OF BARBARA H. MURRAY**

15 I, Barbara H. Murray, declare as follows:

16 1. I am a Special Counsel with Duane Morris LLP, attorneys for Defendant Ronald  
17 Holmes in this matter.

18 2. On May 23, 2014, I spoke with Assistant U.S. Attorney Daniel Schiess about Mr.  
19 Holmes’s request to continue his self-surrender date to August 15, 2014. AUSA Scheiss informed  
20 me that the government agrees to remain silent on Mr. Holmes’s request.

21 3. On that basis, Defendant Ronald Holmes requests that he surrender for service of  
22 sentence at the institution designated by the Bureau of Prisons before 12 p.m. on Friday, August 15,  
23 2014, rather than on May 30, 2014.  
24  
25  
26  
27  
28

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct to the best of my knowledge and belief.

3  
4 Dated: May 23, 2014

**DUANE MORRIS LLP**

5 By: /s/Barbara Howe Murray

6 Michael L. Lipman

7 Barbara Howe Murray

8 Attorneys for Defendant

9 Ronald Holmes

10 **IT IS SO ORDERED.**

11 UNITED STATES DISTRICT JUDGE

12 DATED: \_\_\_\_\_

# **EXHIBIT A**



**GRAND DESERT MEDICAL**  
*A Life Changing Experience*

Date: 05/22/2014

To Whom It May Concern:

RE: Ronald Holmes, DOB: 11/16/1961

This is to certify that Mr. Ronald Holmes has been diagnosed with a severely arthritic left ankle. This condition would continue to deteriorate over the next 3 years without an ankle fusion surgical procedure. We could schedule this procedure during the week of June 5<sup>th</sup>, 2014. If Mr. Holmes waited for a period of 3 years this procedure could become more complicated since he already has type 2 diabetes. Recovery and rehabilitation for this surgery is approximately 8-12 weeks.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chinyere Okeke'.

Chinyere Okeke, MD

Chinyere Okeke, M.D. – Family Medicine  
2001 S. Rainbow Blvd Ste 130, Las Vegas, Nv 89146  
Phone: 702 629 2986 Fax: 1-844-653-5363

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 Attorneys for Defendant Ronald J. Holmes

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	Case # 2:13-CR-192-LRH-GWF-1
	)	
Plaintiff(s),	)	CERTIFICATE OF SERVICE
vs.	)	
	)	
RONALD J. HOLMES,	)	
	)	
Defendant(s).	)	

I am employed in San Diego County, State of California. I am over the age of eighteen (18) and not a party to this action; my business address is 750 B Street, Suite 2900, San Diego, California 92101.

On May 23, 2014, I certify that the following document(s) described as:

**RONALD HOLMES' UNOPPOSED MOTION TO CONTINUE SELF-SURRENDER  
 DATE TO AUGUST 15, 2014;**

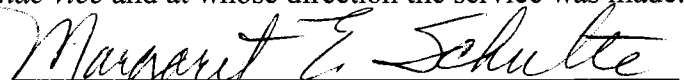
was served on all parties or their counsel of record in Case Number. 2:13-CR-192-LRH-GWF-1

Daniel Schiess: dan.schiess@usdoj.gov, Kelly.Muranaka@usdoj.gov, William.Foley@usdoj.gov

X (Federal) **BY CM/ECF NOTICE OF ELECTRONIC FILING** by causing such document(s) listed above to be served through this Court's electronic transmission facilities via the Notice of Electronic Filing (NEF) and hyperlink, to the parties and/or counsel who are determined this date to be registered CM/ECF Users set forth in the service list obtained from this Court on the Electronic Mail Notice List.

X (FEDERAL): I declare that I am employed in the office of a member of the bar of California who is admitted to this court *pro hac vice* and at whose direction the service was made.

Dated: May 23, 2014

  
 Margaret E. Schulte